



**OPASTCO**

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March 17, 2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

***Ex Parte Notice***

**Re: Developing a Unified Intercarrier Compensation Regime  
CC Docket No. 01-92**

Dear Ms. Dortch:

On March 16, 2006, Chad Miles of Enhanced Telecommunications Corporation in Sunman, IN, and John Rose, John McHugh and Stuart Polikoff of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) met with representatives from the Wireline Competition Bureau and Wireless Telecommunications Bureau. Representing the Wireline Competition Bureau were Donald Stockdale, Steven Morris, Randy Clarke, and Jay Atkinson. Representing the Wireless Telecommunications Bureau were Peter Trachtenberg and Joseph Levin.

In the meeting we discussed the problem rural incumbent local exchange carriers (ILECs) face regarding unbillable traffic – more commonly referred to as “phantom traffic” – and the need for the FCC to address the issue in the near-term. The majority of phantom traffic would become billable traffic if all originating carriers would populate the calling party number (CPN) and called party (CP) fields in the initial address message (as described in the industry-accepted Signaling System 7 standards) and that information was transited accurately to the terminating end office via the exchange message interface (EMI) process. Transiting carriers should not be permitted to manipulate the CPN and CP, and should be required to transport that information intact to the terminating end office. If the call signaling information necessary to bill for a call is incomplete, and a terminating rural ILEC requests a complete set of records from the connecting transiting carrier, then the transiting carrier should be required to locate those records and provide them to the rural ILEC in a timely manner. If the transiting carrier is unwilling to obtain

the necessary information and transmit it to the terminating rural ILEC, the rural ILEC should be permitted to bill the connecting transiting carrier for the call.

Calls terminated by rural ILECs often have multiple transiting carriers between the points of origination and termination. It would be costly and burdensome for rural ILECs to be required to work their way back through the multiple transiting carriers in order to determine the originating carrier to be billed for a call. Therefore, the transiting carrier connected to the terminating rural ILEC should be required to either provide the necessary billing information in a timely manner or accept a bill for the traffic.

Finally, there has been much discussion within the industry over the population of the jurisdictional information parameter (JIP). It should be noted that the JIP is a method of providing the geographic location of the calling party when it is different than the physical location of the switch. In the case of rural wireline carriers, this information is already provided to the terminating end office by inclusion of the CPN in the initial address message. Therefore, it would be duplicative and unnecessary for a rural ILEC to be required to become local number portability capable for the sole purpose of populating the JIP when the originating customer is physically located in the same geographic area served by the rural ILEC's switch. This is always the case for rural wireline carriers serving areas where number porting is non-existent.

In accordance with FCC rules, this letter is being filed electronically in the above-captioned docket.

Sincerely,

Stuart Polikoff  
Director of Government Relations  
OPASTCO